

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

Date filed: February 11, 2015

Name of Company Covered by this Certification: Guam Telecom, LLC

Form 499 Filer ID: 825686

Name of Signatory: James W. Hofman, II

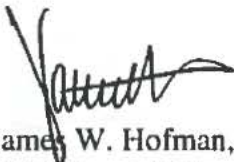
Title of Signatory: Chief Legal Officer

I, James W. Hofman, II, certify that I am the Chief Legal Officer of Guam Telecom, LLC and as such do hereby certify, affirm, depose and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Guam Telecom, LLC. I have personal knowledge that Guam Telecom, LLC has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Guam Telecom, LLC received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Guam Telecom, LLC has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2014. Guam Telecom, LLC will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Guam Telecom, LLC is taking to protect CPNI.

This Certification is dated this 11 day of February, 2015



James W. Hofman, II
Chief Legal Officer
Guam Telecom, LLC

GUAM TELECOM, LLC

STATEMENT OF CPNI OPERATING PROCEDURES

1.) It is the policy of Guam Telecom, LLC (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules, for any purposes other than the following, all of which are permitted without customer approval under FCC rules:

- a.) For the purpose of providing or marketing Company service offerings among categories of service to which the customer already subscribes.
- b.) For the purpose of providing inside wiring installation, maintenance, and repair services.
- c.) For the purpose of marketing "adjunct-to-basic" services, such as speed dialing, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID., and call forwarding.
- d.) For the purpose of protecting the rights or property of the Company, or to protect users of its services and other carriers from fraud, abusive, or unlawful use of or subscription to such services.

2.) The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose other than those set forth above. At present, the Company does not engage in outbound marketing using CPNI

3.) Because the Company does not use, disclose or permit access to CPNI except as described above, by definition, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.

4.) Because the Company does not use CPNI except as described above, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.

5.) With respect to a customer's online access to their information, the company does not provide online access to any CPNI until the customer requesting such access receives a password that has been established without the use of readily available biographical information or account information.

6.) Customers who contact the Company via inbound calls are able to access their call detail information. The Company does take measures to secure the customer information with proper authentication, including the use of passwords and other methods

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that comply with FCC rules to protect call detail information. Billing personnel can provide CPNI data to customers by placing a return call to the customer's telephone number of record and/or mailing the requested information to the address of record, provided that the address of record has not changed within the previous 30 days.

7.) Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.

8.) The Company has not detected any unauthorized access to CPNI, either by employees, pretexters or other third parties. The Company did not receive any customer complaints regarding CPNI in 2013.

9.) The Company will notify the customer immediately if the customer's address of record is created (except at the time of service initiation) or changed. This notification is made by mail to the customer's pre-existing address of record, and does not reveal the changed information.

10.) In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni>, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.

11.) The Company has in place a supervisory review process regarding compliance with its CPNI policy.